

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:11CR437
Plaintiff,)	
v.)	
)	
)	
ANTHONY O. CALABRESE, III)	
SANFORD A. PRUDOFF,)	<u>NOTICE OF RELATED CASE</u>
Defendants.)	

Now comes counsel for the United States, and respectfully provides notice to this Court that this case, charging Defendants Calabrese and Prudoff, is directly related to the following criminal cases involving which have been assigned to the Honorable Sara Lioi:

United States v. John Kevin Kelley, et al., Case No. 1:09CR272

United States v. Anthony Sinagra, Case. No. 1:09CR364

United States v. Frank P. Russo, Case. No. 1:10CR384

United States v. James C. Dimora, Case No. 1:10CR387

Counts 2-4 of the Calabrese Indictment (related to Alternatives Agency County Funding) charge substantially similar criminal conduct to that charged in Counts 2-3 of the Dimora Indictment, Count 2 in the Russo Information, and Count 1 of the Kelley Information (charging Kelley and Brian Schuman). Those charging documents identified Calabrese as an unindicted co-conspirator referenced as Attorney 1.

Count 5-8 of the Calabrese Indictment (related to Alternatives Agency Consultants) charges substantially similar criminal conduct to that charged in Count 2 of the Kelley Information and Count 2 of the Sinagra Information. Those charging documents identified Calabrese as an unindicted co-conspirator referenced as Attorney 1.

Counts 10-11 of the Calabrese Indictment charges substantially similar criminal conduct to that charged in Count 7 of the Kelley Information (charging Kelley, Daniel Gallagher and Kevin Payne). Counts 12 and 13 of the Calabrese Indictment contain extensive factual overlap to Count 10 of the Calabrese Indictment. These counts contain extensive factual overlap to Count 2 of the Samir Mohammad Indictment, 1:10CR389, pending before Judge Lioi.

Count 14 of the Calabrese Indictment charges criminal conduct that includes substantially similar criminal conduct to that charged in Count 8 of the Kelley Information (charging Kelley, Payne and Gallagher). The Information identified Calabrese as an unindicted co-conspirator, Attorney 1.

In as much as the Calabrese Indictment arose out of the same investigation as the Dimora Indictment, 1:10CR387, and charges substantially similar counts, the Government anticipates

that the present case may present substantially similar legal issues as those presented by Dimora and his co-defendants Michael Gabor and Bridget McCafferty. Furthermore, due to the factual overlap with the Mohammad Indictment, the Government anticipates substantially similar issues in the Calabrese case as raised in the Mohammad case.

The Court may wish the Government to provide further details, in camera, as to relatedness.

A copy of this notice will be forwarded to Judge Lioi.

Respectfully submitted,
Eric H. Holder, Jr.
Attorney General of the United States

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CERTIFICATE OF SERVICE

I certify that on this date, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/Antoinette T. Bacon

Antoinette T. Bacon

Assistant U.S. Attorney